



State of New Jersey

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Alison A. Hess, C.P.G.
Project Manager
USEPA Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

July 28, 2014

Re: Standard Chlorine Chemical Company (SCCC) Site
1015 to 1035 Belleville Turnpike
Town of Kearny, Hudson County
SRP PI# G000001583
Activity Number Reference: RPC000001

Dear Ms. Hess:

The New Jersey Department of Environmental Protection (Department) has reviewed the Revised Screening Level Ecological Risk Assessment (SLERA) dated July 9, 2014 and the Performing Parties Group Response (PPG) to the United States Environmental Protection Agency (USEPA) Comments regarding the May 2014 SLERA document. The Department has reviewed the above mentioned documents in accordance with its guidance and policy, and provides the following comments and/or recommendations for your consideration.

General Comment

The Department's review of PPG's response to USEPA's comments is acceptable with the exception of PPG's response comment #4. If shallow groundwater does not discharge to the wetlands and the wetlands are located at an elevation greater than the water table surface, why are the wetlands inundated with open water as shown in photos 11 and 12 in the SLERA?

As provided in the Department's June 5, 2014 letter to the USEPA, the original comment on these wetlands is as follows:

Comment #3: Pages 2-9 and 2-10 (text accompanying Photos 11 and 12) briefly describe placement of the capillary break in areas that include reconstructed wetlands. Permeable

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capillary breaks such as those described do not function in inundated areas like those shown in the photos. The Department has reservations about whether contaminated groundwater is adequately prevented from impacting surface water and sediments on Site. Complete exposure pathways may still exist in these wetlands. In order to assess potential exposures to eco-receptors all across the Site, NJDEP recommends surface water and sediment samples be collected from all emergent wetlands on the Site before the necessity of a BERA is negated. Several rounds of sampling may be necessary to capture the wet season.

If you have any questions regarding this matter, you may contact me at (609) 633-1448 or by email at Jay.Nickerson@dep.nj.gov.

Sincerely,



Jay Nickerson
Bureau of Case Management
Site Remediation Program
New Jersey Department of Environmental Protection

cc. Jay Nickerson, BCM, NJDEP
Steve Byrnes, BEERA, NJDEP
David Van Eck, BGWPA, NJDEP